



November 8, 2013

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: Modernizing the E-Rate Program for Schools and Libraries, WC Docket No. 13-184**

Dear Ms. Dortch:

On November 8, 2013, Evan Marwell, CEO of EducationSuperHighway met via teleconference with Michael Steffen, Lisa Hone, Michael Byrne and Mark Walker. The purpose of the meeting was to discuss potential analysis EducationSuperHighway might do to inform the Commission's July 23, 2013 Notice of Proposed Rulemaking WC Docket No. 13-184.

The discussion covered four topics: (1) the creation of a Form 471 Item 21 data entry portal; (2) a national analysis of Form 471 block 2 data; (3) an analysis of procurement best practices and development of a framework for administering an upgrade fund; and (4) the usefulness of potential pilots within the E-rate program.

In regards to the Item 21 data entry portal we discussed what data such a portal would need to collect, how such data might be categorized and what the benefits of such a portal would be for the Commission and other stakeholders. We also discussed constraints that would need to be accounted for in order to implement such a system.

In regards to the Form 471 Block 2 data analysis we provided feedback on an initial look at the national data set that might be used to replicate the analysis that Verizon performed as part of its NPRM comments. We identified three issues for the Commission that significantly reduce the accuracy and effectiveness of such an analysis:

1. The data set is full of clearly erroneous data that would need to be manually clarified. As an example, the national data set suggests there are over 400,000 school buildings – a number close to three times the number that actually exist.
2. If the purpose of the analysis is to estimate the number of schools that currently have fiber connectivity, it is unclear how to interpret schools which report 50-100 Mbps of bandwidth as that range could be delivered with either copper or fiber.
3. It is impossible to know what applicants are actually reporting. Are they reporting the bandwidth of the district Internet connection and applying it to all buildings, or are they reporting the bandwidth of the actual wide area network connection to the school? There appear to be many applicants who reported the former which is not helpful in determining if the building is connected by fiber.

We also discussed whether it would be helpful to develop a discussion framework for how to administer an upgrade fund in conjunction with other parties and what types of pilot programs conducted during the 2013-14 E-rate cycle could be completed in time to inform the Commission NPRM.

Kindly direct any questions regarding this matter to my attention.

Sincerely,

*/s/ Evan Marwell*  
Evan Marwell  
CEO

cc: Michael Steffen  
Lisa Hone